

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal Action No. 06-79

RITCHIE JACKSON,

Defendant.

REDACTED

INDICTMENT

The Grand Jury for the District of Delaware charges that:

Introduction

1. At all times relevant to this Indictment, Citizens Bank was a federally insured financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation or FDIC.

Scheme to Defraud

2. Beginning in or around February 2005, and continuing at least until in or around May, 2005, "S", an unindicted co-conspirator, supplied Ritchie Jackson, the defendant, with counterfeit checks. "S" paid the defendant to negotiate the checks at different Citizens Bank branches in and around Delaware.

3. The face of each counterfeit check showed that it was issued to an individual, the payee. So that the defendant could negotiate the checks, "S" supplied the defendant with identification, specifically, fraudulent driver's licenses bearing the names of the payees on the checks.



4. After receiving each counterfeit check and piece of identification, Ritchie Jackson, the defendant, went to branches of Citizens Bank, showed the fraudulent identification, and cashed, or attempted to cash, each check.

COUNT ONE

5. From on or about February 22, 2005, through on or about May 31, 2005, in the District of Delaware, Ritchie Jackson, defendant herein, and "S", an unindicted co-conspirator known to the grand jury, did knowingly conspire with each other to execute and attempt to execute a scheme and artifice to defraud Citizens Bank, a federally insured financial institution, as described more fully in paragraphs 1 through 4 above, incorporated herein by reference, in violation of 18 U.S.C. § 1344, and in execution of the fraud and in furtherance of the conspiracy, the defendant committed the following overt acts:

- a. On or about February 22, 2005, the defendant, using identification in the name "A.P.", went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$4,375.25 drawn on the account of "Title Associates of Virginia, Inc.>";
- b. On or about February 22, 2005, the defendant, using identification in the name "E.N.", went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$4,375.25 drawn on the account of "Title Associates of Virginia, Inc.>";
- c. On or about March 3, 2005, the defendant, using identification in the name "M.C.", went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$4,625.50 drawn on the account of "Amalgamated Life UNITE Fund Administrators";

d. On or about March 5, 2005, the defendant, using identification in the name “T.S.”, went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$2,210.50 drawn on the account of “Amalgamated Life UNITE Fund Administrators”;

e. On or about March 5, 2005, the defendant, using identification in the name “C.D.” went to a Citizens Bank branch and attempted to cash a counterfeit check in the amount of \$2,210.50 drawn on the account of “Amalgamated Life UNITE Fund Administrators”;

f. On or about March 15, 2005, the defendant, using identification in the name “P.M.”, went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$3,675 drawn on the account of “K and M Construction”;

g. On or about March 23, 2005, the defendant, using identification in the name “B.W.”, went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$4,788.36 drawn on the account of “Henrey Troemner LLC”;

h. On or about March 30, 2005, the defendant, using identification in the name “T.D.”, went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$3,845.10 drawn on the account of “Korman Residential Development, Inc.”;

i. On or about March 30, 2005, the defendant, using identification in the name “H.L.”, went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$3,685.50 drawn on the account of “Austarr Moving Inc.”;

j. On or about April 7, 2005, the defendant, using identification in the name “J.F.”, went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$4,075.95 drawn on the account of “Maximum Cleaning Carpet & Janitorial Service”;

k. On or about April 7, 2005, the defendant, using identification in the name "L.N.", went to a Citizens Bank branch and cashed a counterfeit check in the amount of \$4,075.95 drawn on the account of "Maximum Cleaning Carpet & Janitorial Service";

l. On or about May 31, 2005, the defendant, using identification in the name "R.W.", went to a Citizens Bank branch and attempted to cash a counterfeit check in the amount of \$3,300 drawn on the account of "J.L."; and

m. On or about May 31, 2005, the defendant, using identification in the name "S.K.", went to a Citizens Bank branch and to cashed a counterfeit check in the amount of \$3,300 drawn on the account of "J.L."

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

6. From on or about February 22, 2005, through on or about May 31, 2005, in the District of Delaware, Ritchie Jackson, defendant herein, did knowingly execute and attempt to execute a scheme and artifice to defraud Citizens Bank, a federally insured financial institution, in that the defendant, Ritchie Jackson, was engaged in a scheme and artifice to defraud as described in paragraphs 1 through 5(m) above, incorporated herein by reference, and, in execution of the scheme the defendant negotiated counterfeit checks as described in paragraphs 5(a) through 5(m) above, incorporated herein by reference, all in violation of Title 18, United States Code, Section 1344.

COUNT THREE

7. From in or around February 2005, through in or around May 2005, in the State

and District of Delaware, Ritchie Jackson, defendant herein, did knowingly use, without lawful authority, means of identification of at least 13 persons during and in relation to a violation of the bank fraud statute, 18 U.S.C. § 1344, as described in paragraphs 1 through 6 above, incorporated herein by reference, all in violation of Title 18, United States Code, Section 1028A.

A TRUE BILL:

Foreperson

COLM F. CONNOLLY
United States Attorney

BY: 
Beth Moskow-Schnoll
Assistant United States Attorney

Dated: July 13, 2006

Date _____ Day of _____, 19____

Dear Sirs —
I am enclosing you a copy of the
bill of exchange, which will be sent
you by express, and will be paid
you at the time of your arrival.
Yours very truly,
John D. Williams.